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May 11, 2006

## **FILED ELECTRONICALLY AND HAND-DELIVERY**

The Honorable Charles L.A. Terreni  
Chief Clerk  
**South Carolina Public Service Commission**  
101 Executive Center Dr., Suite 100  
Columbia, SC 29210

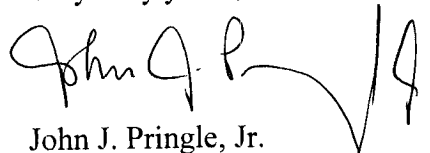
- RE: Petition of Charter Fiberlink SC – CCO, LLC for Arbitration with Chesnee Telephone Company, Inc. **2006-137-C**
- RE: Petition of Charter Fiberlink SC – CCO, LLC for Arbitration with Lockhart Telephone Company **2006-139-C**
- RE: Petition of Charter Fiberlink SC – CCO, LLC for Arbitration with West Carolina Rural Telephone Cooperative **2006-138-C**

Dear Mr. Terreni:

Enclosed is the **Motion for Consolidation** filed on behalf of Charter Fiberlink SC – CCO, LLC in the above-referenced matter.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it via the bearer of these documents. If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

  
John J. Pringle, Jr.

cc: Office of Regulatory Staff Legal Department, Margaret Fox, Esquire  
Carrie L. Cox, Esquire, Charles A. Hudak, Esquire  
Enclosures

**THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS.**

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

In Re: )  
)  
Petition of Charter Fiberlink SC – CCO, LLC )  
for Arbitration of Certain Terms and )  
Conditions of Proposed Agreement with )  
Chesnee Telephone Company, Inc. )  
Concerning Interconnection under the )  
Communications Act of 1934, as amended by )  
the Telecommunications Act of 1996 )

Docket No. \_\_\_\_\_

FILED  
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PUBLIC SERVICE COMMISSION  
COLUMBIA, SC

In Re: )  
)  
Petition of Charter Fiberlink SC – CCO, LLC )  
for Arbitration of Certain Terms and )  
Conditions of Proposed Agreement with )  
Lockhart Telephone Company Concerning )  
Interconnection under the Communications )  
Act of 1934, as amended by the )  
Telecommunications Act of 1996 )

Docket No. \_\_\_\_\_

In Re: )  
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Petition of Charter Fiberlink SC – CCO, LLC )  
for Arbitration of Certain Terms and )  
Conditions of Proposed Agreement with )  
West Carolina Rural Telephone Cooperative )  
Concerning Interconnection under the )  
Communications Act of 1934, as amended by )  
the Telecommunications Act of 1996 )

Docket No. \_\_\_\_\_

**MOTION FOR CONSOLIDATION**

**COMES NOW** Charter Fiberlink SC – CCO, LLC (“Charter Fiberlink”), by its undersigned counsel, and hereby submits to the Public Service Commission of South Carolina (the “Commission”) this Motion For Consolidation (the “Motion”) pursuant to S.C. Code Ann. § 58-9-1240 and 26 S.C. Code Regs. 103-864. For the reasons stated herein, Charter Fiberlink respectfully requests that the Commission consolidate the arbitration proceedings that Charter Fiberlink commenced on equal date herewith against each of the following incumbent local exchange carriers

in South Carolina: Chesnee Telephone Company, Inc., Lockhart Telephone Company and West Carolina Rural Telephone Cooperative (collectively, “the ILECs”).

1. Contemporaneously with the filing of this Motion, Charter Fiberlink has filed a petition for arbitration pursuant to Section 252(b) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, and thus has initiated a separate proceeding before the Commission, against each respective ILEC.

2. Other than to separately identify the name and business address of the ILEC, the arbitration petitions filed with the Commission by Charter Fiberlink against the ILECs are identical. The facts contained in the arbitration petitions involving the ILECs are identical. The unresolved issues described in the arbitration petitions are identical. And, the relief requested by Charter Fiberlink in the arbitration petitions against the ILECs is identical.

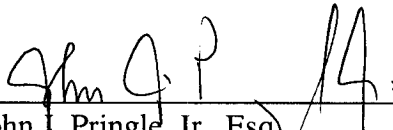
3. There are no issues that are unique to any individual ILEC that would complicate or delay resolution of a consolidated proceeding because the facts, unresolved issues and relief requested in the arbitration petitions against the ILECs are identical.

4. Consolidation of the arbitration proceedings against the ILECs will prevent the need for three (3) separate hearings and other duplicative procedures and/or filings, thereby reducing the administrative burden placed on, and expenses incurred by, the parties and the Commission. Thus, consolidation of the three (3) arbitration proceedings will promote efficiency and conserve administrative resources. No party will be prejudiced by the consolidation of the arbitration petitions into a single, consolidated proceeding and hearing.

**WHEREFORE**, Charter Fiberlink respectfully requests that the Commission consolidate the arbitration proceedings that Charter Fiberlink commenced on equal date herewith against Chesnee

Telephone Company, Inc., Lockhart Telephone Company and West Carolina Rural Telephone Cooperative, and grant such other and further relief as may be appropriate.

**RESPECTFULLY SUBMITTED**, this 11th day of May, 2006.

  
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John I. Pringle, Jr., Esq.

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